

Jon F. Sands
Marilyn S. Chappell
Sweetbaum Sands Anderson PC
1125 17th St., Suite 2100
Denver, CO 80202
303-296-3377
jsands@sweetbaumsands.com

Julie Nye Tiedeken
Wyoming Bar #5-1949
McKellar, Tiedeken & Scoggin, LLC
P.O. Box 748
Cheyenne, WY 82003-0748
307.637.5575
307.637-5515
jtiedeken@mtslegal.net

ATTORNEYS FOR
COUNTERCLAIM-DEFENDANT
UMIA INSURANCE, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

HOMELAND INSURANCE COMPANY OF)
OF NEW YORK)

Plaintiff,)

v.)

Civil Action No. 15-CV31-J

POWELL HOSPITAL DISTRICT, POWELL)
VALLEY HEALTHCARE, INC.,)
HEALTHTECH MANAGEMENT SERVICES,)
INC., JEFFREY HANSEN, M.D. and)
WILLIAM D. PATTEN,)

Defendants.)

AND)

HEALTHTECH MANAGEMENT SERVICES,)
INC. and WILLIAM D. PATTEN,)

Counterclaimants)

v.)

UMIA INSURANCE, INC. and LEXINGTON)
INSURANCE COMPANY)

)
Counterclaim-Defendants)
)
AND)
)
POWELL HOSPITAL DISTRICT, POWELL)
VALLEY HEALTH CARE, INC., and JEFFREY)
HANSEN, M.D.,)
)
Cross-Claimants,)
)
v.)
)
UMIA INSURANCE, INC., and LEXINGTON)
INSURANCE COMPANY)
)
Crossclaim-Defendants.)

MOTION FOR ENTRY OF PROTECTIVE ORDER

Counterclaim-Defendant UMIA Insurance, Inc., through undersigned counsel, respectfully moves this Court pursuant to Fed.R.Civ.P. 26(c) to enter the Protective Order submitted with this Motion. Pursuant to Local Rule 7.1(b)(1)(A), UMIA's counsel certifies that extensive communications regarding the proposed Protective Order have occurred among counsel for all parties, and UMIA's counsel does not believe there is currently any opposition to the proposed Protective Order. Good cause exists for entry of the Protective Order pursuant to Fed.R.Civ.P. 26(c), to protect the confidentiality of documents, including medical records, which may be subject to production in this action.

Respectfully submitted,

s/ Jon F. Sands

Jon F. Sands
Marilyn S. Chappell
Sweetbaum Sands Anderson PC
1125 Seventeenth Street, Suite 2100
Denver, Colorado 80202
Phone: (303) 296-3377
jsands@sweetbaumsands.com
mchappell@sweetbaumsands.com

/s/ Julie Nye Tiedeken

JULIE NYE TIEDEKEN WSB #5-1949
MCKELLAR, TIEDEKEN & SCOGGIN, LLC
702 Randall Avenue
Cheyenne, Wyoming 82001
(307) 637-5575
(307) 637-5515 FAX
jtiedeken@mtslegal.net

ATTORNEYS FOR COUNTERCLAIM-
DEFENDANT UMIA INSURANCE, INC.

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2015, the foregoing **MOTION FOR ENTRY OF PROTECTIVE ORDER AND PROPOSED PROTECTIVE ORDER** was served via CM/ECF email notification to the following:

<p><i>Attorneys for Plaintiff Homeland Insurance Company of New York:</i> Judith Studer, Esq. (5-2174) Schwartz, Bon, Walker & Studer, LLC 141 South Center Street, Suite 500 Casper, WY 82601 Phone: (307) 234-5099 Email: jstuder@schwartzbon.com</p> <p>Charles E. Spevacek, Esq. (admitted pro hac vice) Tiffany M. Brown, Esq. (admitted pro hac vice) Meagher & Geer, PLLP 33 South Sixth Street, Suite 4400 Minneapolis, MN 55402 Phone: (612) 338-0661 Email: cspevacek@meagher.com tbrown@meagher.com</p>	<p><i>Attorneys for Defendant Powell Hospital District and Powell Valley Healthcare:</i> Tracy J. Copenhaver, Esq. Copenhaver, Kath, Kitchen Kolpitcke, LLC 224 N. Clark Street P. O. Box 839 Powell, WY 82435 Phone: (307) 754-2276 Email: tracy@ckattorneys.net</p>
<p><i>Attorneys for Defendants HealthTech Management Services, Inc. and William D. Patten:</i> Joanna R. Vilos, Esq. (6-4006) Holland & Hart LLP P. O. Box 1347 Cheyenne, WY 82003-1347 Phone: (307) 778-4200 Email: jvilos@hollandhart.com</p> <p>Jose A. Ramirez, Esq. (admitted pro hac vice) Holland & Hart LLP 8390 E. Crescent Parkway, Suite 400 Greenwood Village, CO 80111 Phone: (303) 290-1600 Email: jramirez@hollandhart.com</p>	<p><i>Attorneys for Lexington Insurance Company:</i> R. Jeff Carlisle, Esq. (California State Bar 76009) Catherine A. Naltsas, Esq. (California State Bar 262259) Farah Naz A. Namvar, Esq. (California State Bar 291765) LYNBERG & WATKINS, APC 888 South Figueroa Street, 16th Floor Los Angeles, California 90012 T: 213-624-8700 F: 213-892-2763 jcarlisle@lynberg.com cnaltsas@lynberg.com fnamvar@lynberg.com</p> <p>Deborah M. Kellam Special Counsel HALL & EVANS, LLC 2015 Central Avenue, Suite C Cheyenne, Wyoming 82001 T: 307-514-2567 F: 307-514-2568 kellamd@hallevans.com</p>

/s/ Julie Nye Tiedeken
McKellar, Tiedeken & Scoggin, LLC